



## Modern Slavery Act Policy Statement

Employment should be freely chosen. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of one (or more) person's liberty by another in order to exploit them for personal or commercial gain.

ODASEVA has a zero-tolerance approach to modern slavery. We act ethically and with integrity in all our business dealings and relationships and will swiftly, decisively and resolutely enforce systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

ODASEVA has global offices and is dedicated to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our entire network of supplier partners.

This policy applies to everyone working for or on our behalf, in any capacity, including employees at all levels, directors and officers (each a "Team Member"), agency workers, seconded workers, volunteers, agents, contractors and subcontractors, external consultants, third-party representatives and supplier partners ("Partners").

This policy may be amended by ODASEVA at any time.

### Ethical Standards

Through ODASEVA policies and practices we communicate our values and expectations, setting a high bar for ourselves, Team Members and Partners, making clear that we do not and will not abide even a scintilla or hint of the existence of modern slavery in the conduct of our business operations.

- The people that support our business are treated with fundamental dignity and respect.
  - We do not abide the use of child labor, forced labor, or human trafficking in any form in our operations or value chain.
- Our approach is informed by international standards.
  - We respect, support and abide by the United Nations (UN) Guiding Principles on Business and Human Rights.
- We conduct our business in a lawful and ethical manner.
  - The ODASEVA Code of Conduct and guiding principles on professional standards establish that in performing job duties, Team Members and supplier partners must

always act in a moral, decent and honorable manner, upholding the best interests of ODASEVA, our respective clients and customers.

- Team Members undergo mandatory annual compliance training on ethical business practices.

### Responsibility for the Policy

Senior Management of ODASEVA has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our direction or control are in compliance.

ODASEVA'S Legal and Human Resources departments have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. We continually monitor and review work products to ensure no violations of this policy occur and if they do, are promptly reported to the appropriate authorities.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and receive any required training.

### Compliance with the Policy

Accountability is shared. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for, with or under our control or direction. Team Members are required to actively avoid any activity that might lead to, or suggest, a breach of this policy and promptly report any bona fide suspicions to management.

Anyone holding a good faith belief that an individual may be subject to modern slavery, involuntary servitude, human trafficking or any compulsory labour practice may report it without fear of reprisal, intimidation or threats of retribution by emailing [legal\\_administration@odaseva.com](mailto:legal_administration@odaseva.com). A Team Member who reasonably believes or suspects a breach of this policy has occurred or that it is likely to occur in the future must notify his/her manager as soon as possible. If a Team Member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, he/she must raise it with his/her manager, a member of the Supplier Partnerships team or through the Modern Slavery Alert email address.

ODASEVA encourages openness and will support anyone who raises genuine concerns in good faith under this policy even if they turn out to be mistaken. No one will be subjected to any reprisal, retribution or detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If any individual believes he or she has suffered any such treatment, he or she should inform a member of the management team immediately.

### **Communication and Awareness of Policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be provided, where needed.

ALL TEAM MEMBERS, SUPPLIERS, CONTRACTORS AND BUSINESS PARTNERS MUST ABIDE BY ODASEVA ZERO-TOLERANCE APPROACH TO MODERN SLAVERY AT ALL TIMES THROUGHOUT OUR BUSINESS RELATIONSHIP.

### **Breach of this Policy**

Any Team Member, Supplier or Partner – at any level – found to have breached this policy will face disciplinary action, which could result in dismissal or termination of employment or termination of a contract, as the case may be, for misconduct or gross misconduct.